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Proposed Attorneys for Debtor in Possession
 Moore Holdings, LLC

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

In re:

MOORE HOLDINGS, LLC,
 Debtor in Possession.

Chapter 11 Case No. 25-20053

DCN: UST-1

**DECLARATION OF MARK MOORE IN
 SUPPORT OF DEBTOR IN
 POSSESSION'S SURREPLY TO
 MOTION OF THE UNITED STATES
 TRUSTEE, PURSUANT TO 11 U.S.C. §
 1112(B) AND FEDERAL RULES OF
 BANKRUPTCY PROCEDURE 1017(F)
 AND 9014, TO CONVERT OR DISMISS
 CHAPTER 11 CASE**

Date: March 27, 2025
 Time: 10:30 AM
 Dept: E, Courtroom 33, 6th Floor

Hon. Judge Ronald H. Sargis

**DECLARATION OF MARK MOORE IN SUPPORT OF DEBTOR IN POSSESSION'S
 SURREPLY TO MOTION OF THE UNITED STATES TRUSTEE, PURSUANT TO 11
 U.S.C. § 1112(B) AND FEDERAL RULES OF BANKRUPTCY PROCEDURE 1017(F)
 AND 9014, TO CONVERT OR DISMISS CHAPTER 11 CASE**

I, Mark Moore, declare as follows:

1. I am over eighteen years of age, and am the 26% partner of Moore Holdings, LLC.,
 the debtor in possession ("Debtor") for this Chapter 11 bankruptcy case.

1 2. Based on my role as a partner for Debtor, I have personal knowledge of each of the
2 facts set forth in this declaration and, if called to testify as a witness, I could and would competently
3 do so.

4 3. Immediately upon becoming aware of the insurance coverage deficiency identified
5 by the United States Trustee (“UST”), Debtor proactively sought and successfully obtained
6 comprehensive insurance coverage covering both property and liability through an independent
7 carrier. On March 13, 2025, Debtor promptly provided initial proof of insurance to the UST.

8 4. As of today, Debtor obtained the Certificate of Insurance from the insurance carrier
9 and provided to the UST. This certificate includes the policy number, policy period, and all other
10 details required by the UST. Exhibit B.

11 5. Debtor is actively pursuing receipt of the complete policy documentation, including
12 policy binder from the carrier, which Debtor will immediately provide to the Court and the UST
13 upon its receipt. This will conclusively resolve any remaining concerns regarding insurance
14 coverage compliance.

15 6. Any delays experienced by the Debtor in obtaining insurance documentation were
16 inadvertent and solely attributable to external factors in the insurance market, not from neglect or
17 intentional noncompliance by the Debtor.

18 7. Debtor's expenditures alleged to constitute unauthorized cash collateral usage by
19 Poppy Bank were minimal, reasonable, and necessary expenses directly related to maintaining the
20 Debtor's business.

21 8. To proactively cure any alleged unauthorized expenditures and improve the
22 Debtor's cash position, Debtor successfully negotiated and finalized a repayment arrangement
23 with InnerScope Hearing Technologies, a tenant with substantial rent arrears exceeding \$500,000.
24 Under this repayment plan, Debtor has already received an initial payment of \$5,000 on March 25,
25 2025, and expects regular monthly payments going forward. Exhibit C.

26 9. Additionally, Debtor successfully executed a lease with a new tenant since the
27 UST's filing of the motion, thereby increasing Debtor's monthly rental income by approximately
28 \$2,199.65. Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of March 2025, at Roseville, California.

Mark Moore
Managing Member for Moore Holdings, LLC
the Debtor in Possession